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October 8, 2024

**BY ECF**

Honorable Margaret M. Garnett  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, New York 10007

The motion to adjourn the post-discovery conference is DENIED and the parties are ORDERED to appear before the Court on **October 10, 2024 at 11:30a.m.** as previously scheduled. *See* Dkt. No. 19. The Court shall discuss the parties' request to extend discovery, and their failure to meet appropriate deadlines for such a request, at the conference.

**SO ORDERED.** Dated October 8, 2024.

Re: Isbell v. City  
No. 23-CV-

  
HON. MARGARET M. GARNETT  
UNITED STATES DISTRICT JUDGE

Your Honor:

I am an Assistant Corporation Counsel in the Office Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, counsel for Defendant City of New York ("the City") in the above-referenced matter. The parties write jointly to request a 45-day extension of time to conduct discovery from September 26, 2024, to November 13, 2024. Additionally, pursuant to the Court's Individual Rules of Practice, the parties are required to submit a joint letter in advance of a post-discovery conference currently scheduled for October 10, 2024. The parties also request an extension of that deadline to November 20, 2024. This is the parties' second request to extend the discovery deadline, the first having been granted on July 23, 2024. ECF No. 19.

In recent months, both counsel for Plaintiff and Defendant have experienced delays caused by existing workload and conflicting deadlines, which have prevented adherence to the Scheduling Order (ECF No. 17). Defendant requires additional time to respond to Plaintiff's Demands and Interrogatories and to schedule Plaintiff's deposition. Plaintiff also requires additional time to schedule the deposition of her former supervisor Brian Calloway. The parties therefore respectfully request an additional forty-five (45) days to complete all discovery.

We thank the Court for its attention in this matter.

Respectfully,

/s/  
Rodalton J. Poole  
Assistant Corporation Counsel

Respectfully

/s/  
Courtney Davy  
Attorney for Plaintiff